

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

Sean Parnell and Luke Negron,
Plaintiffs,

v.

Allegheny County Board of Elections; Rich
Fitzgerald, in his official capacity as a member
of the Allegheny County Board of Elections;
Samuel DeMarco III, in his official capacity as
a member of the Allegheny County Board of
Elections; and Bethany Hallam, in her official
capacity as a member of the Allegheny County
Board of Elections,

Defendants.

No. 20-cv-1905

PROPOSED INTERVENORS-DEFENDANTS' MOTION TO INTERVENE

Proposed Intervenor-Defendants DCCC and Congressman Conor Lamb move for leave to participate in this action to defend their interests against the claims asserted by Plaintiffs. For the reasons discussed in the memorandum in support, Proposed Intervenor-Defendants are entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Intervenor-Defendants request permissive intervention pursuant to Rule 24(b). In accordance with Rule 24(c), a proposed answer to Plaintiffs' complaint is attached as Exhibit A and a proposed opposition to Plaintiffs' motion for injunctive relief is attached as Exhibit B.

WHEREFORE, Proposed Intervenor-Defendants request that the court grant them leave to intervene in the above-captioned matter.

Dated: October 22, 2020.

Respectfully submitted,

/s/ _____

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Counsel for Proposed Intervenor

**Motions for Admission Pro Hac Vice
Forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on Thursday, October 22, 2020, on I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/
Counsel for Proposed Intervenors